

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

George D. McCarley
Plaintiff

v.

Household Finance Corporation III
Defendant

Civil Action No. 3:06-CV-0091-MEF

Lead Case¹

2008 FEB -4 A 10:04

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

MOTION TO RECONSIDER

Plaintiff respectfully requests the court to reconsider its order of January 30, 2008, (dismissal of the instant case). Plaintiff proved beyond doubt that defendant has (a) lied, (b) committed fraud and perjury, and plaintiff provided this court in Document 117, concise evidence documents to that effect. The courts dismissal order therefore has the duplicitous effect of REWARDING a defendant act of lies, fraud, and perjury by legal document as practiced by this defendant. In the Doc 24 paragraph below, plaintiff has provided the court a recital of criminal behavior already adjudged against this defendant.

This is the case of George D. McCarley, a former American Serviceman with service in 4 war zones, who attempts to right an extensive injury inflicted by a vast international financial network consisting of a (i) Chinese Bank³ chartered to launder Opium⁴ money(Doc. 19, Ex 59), (ii) that bank was assessed a heavy fine⁵ for moving Saddam's money around the world (Doc. 19, Ex 57), (iii) admitted TILA/TRESPA wrongdoing in the largest class action⁶ settlement in history, (iv) then only months later, in duplication of their Class Action violations, fraudulently foreclosed George McCarley. HSBC is the leader of the practice of "predatory lending" which in conjunction with Wells Fargo, Citibank and now Bank of America, fraudulently foreclose over 1000⁷ innocent families per day.

¹ 3:06 cv 00091 includes Household Finance Corporation, III (00093), HSBC-Gr. Corp. (00102), HSBC Mortgage Services, Inc. (00104), HSBC Finance Corporation (00101), Household International, Inc. (00103).

² Plaintiff reminds this court he is a non-attorney, Pro Se IFP Litigant

³ HSBC Hong Kong and Shanghai Banking Company acquired Household Finance in 2003.

⁴ See HOOVERS HANDBOOK OF WORLD BUSINESS 2001, page 274

⁵ US Treasury Dept Freedom of Information document in evidence


⁶ Footnote 1, plus, State of Washington v. Household International Class Action Consent, Superior Court of Washington, County of King, No. 02-35630-3SEA (August 7, 2003)

⁷ See financial statements "credit loss provision" and interpolate (new record of 100,000 in Nov2006)

Further, page one of Doc 117 objection cannot be more clear:

1. Defendant lied to the Alabama Attorney General in 2001
2. Defendant now repeats that lie to this court
3. Defendant premises entire case upon that lie

Plaintiff learned many lessons and adopted a lifestyle of honor and integrity as an officer in the United States Army. He would therefore be remiss to allow any judge to enact an order allowing such wholesale lack of ethics and integrity as demonstrated by the evidence presented of this defendant act of lie, fraud and perjury. Unless the court adjudges the defendant guilty, then the court fully encourages this criminal defendant to continue their practice of lies, fraud, perjury. We therefore most respectfully request this court (i) reconsider, (ii) vacate the dismissal order, and (iii) grant summary judgment in favor of plaintiff.


George D. McCarley, Pro Se
216B Chestnut Street
Roanoke, Al 36274
334-863-1435

PROOF OF SERVICE

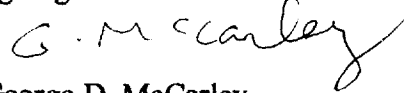
I, George D. McCarley, do swear or affirm that on this date, February 1, 2008, as required by Supreme Court Rule 29 I have served the enclosed RESPONSE on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing envelope containing the above documents in the United States Mail properly addressed to each of them, and with first class postage prepaid, or by delivery to a third party commercial carrier for delivery within 3 calendar days.

The Clerk
Middle District of Alabama, Eastern Division
One Church Street, PO Box 711
Montgomery, Al 36101-0711
334-954-3600

Defendant Attorney
Mr. George Parker
Bradley Arant Rose and White
Alabama Center for Commerce
401 Adams Avenue, Suite 780
Montgomery, Al 36104
334-956-7671, 956-7700

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 1, 2008


George D. McCarley